

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TIMOTHY F.L. HAYES, a resident of	)	
The United Kingdom	)	
Plaintiff,	)	
	)	
v.	)	Case No. 08 C 632
	)	
FIRST CHICAGO MORTGAGE CO., an	)	
Illinois corporation, JASON J. LAMBERT, an	)	Judge Zagel
Illinois resident, KROLL FACTUAL DATA	)	
CORPORATION, a Colorado corporation,	)	
JOHN DOES 1-5, and ABC	)	
CORPORATIONS 1-5,	)	
Defendants.	)	

**NOTICE OF MOTION**

TO: Kevin William Doherty	kwd@doherty-progar.com
Steven Pascal Gomberg	sgomberg@freebornpeters.com
Todd Edward	Macey tem@doherty-progar.com
Michael Stewart Mayer	mmayer@freebornpeters.com
Michael Joseph Progar	mjp@doherty-progar.com, sjl@doherty-progar.com

**PLEASE TAKE NOTICE** that on **June 12, 2008 at 10:15 a.m.**, I shall appear before the Honorable James B. Zagel in Room 2503 of the United States District Court, Northern District of Illinois, Eastern Division, and shall there and then present **PLAINTIFF'S MOTION TO STRIKE ARGUMENTS RAISED FOR FIRST TIME IN REPLY**, a copy of which has been filed with the Court's ECF System, and will be delivered to chambers in accordance with the Local Rule 5.2.

/s/Alexander H. Burke

Keith J. Keogh  
Alexander H. Burke  
LAW OFFICES OF KEITH J. KEOGH, LTD.  
227 W. Monroe Street, Suite 2000  
Chicago, IL 60606  
312.726.1092/ 312.726.1093 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2008, I caused a true and correct copy of the foregoing to be served upon the individuals listed above via ECF electronic delivery.

/s/Alexander H. Burke